

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DAICHENA THOMAS, individually and as  
the personal representative of Estate of Palmer  
Pearce Joseph Wright; DANA THOMAS,  
individually; DEVONTAY THOMAS,  
individually; DELON ARMSTRONG,  
individually; JW, individually; GERMAINE  
CERMENA, individually,

Plaintiffs,

vs.

CLARK COUNTY; LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT;  
CLARK COUNTY DETENTION CENTER;  
WELLPATH, LLC; CORRECT CARE  
SOLUTIONS, LLC; J. MARCOS, RN; EARL  
D. SALVIEJO, NP; TANJA WASIELEWSKI,  
RN; H. TADDEO, RN; ACE T. RN; LARRY  
WILLIAMS, RN; H. HANNASH, RN;  
DAVID OLIPHANT, PA; LPN ALEXIA;  
BECKY S. CHRISTENSEN, RN; RAY  
MARTIN MONTENEGRO, NP; KATE  
PURCELL, RN; DOES I through C, inclusive,  
and ROE CORPORATIONS I though II,  
inclusive,

Defendants.

Case No. 2:22-CV-0899-GMN-NJK

**~~STIPULATION AND ORDER TO~~  
EXTEND TIME TO FILE RESPONSES  
TO WELLPATH, LLC'S RENEWED  
MOTION FOR ORDER TO SHOW  
CAUSE WHY FELICIA TRIMBLE  
SHOULD NOT BE HELD IN CONTEMPT  
FOR FAILING TO APPEAR FOR  
DEPOSITION UNDER SUBPOENA**

IT IS HEREBY STIPULATED AND AGREED between the parties, Las Vegas Metropolitan Police Department ("LVMPD"); Wellpath, LLC; Correct Care Solutions, LLC; J. Marcos, RN; Earl D. Salviejo, NP; Tanja Wasielewski, RN; H. Taddeo, RN; Ace T. RN; Larry Williamson, RN; H. Hannash, RN; David Oliphant, PA, LPN Alexia; Becky S. Christensen, RN; Ray Martin Montenegro, NP, and Kate Purcell, RN's ("Wellpath Defendants"); and Plaintiffs, Daichena Thomas, Dana Thomas, Devontay Thomas, Delon Armstrong, JW, and Germaine Carmena, ("Plaintiffs"), by and through their respective counsel that the deadline to file a response to ECF No. 55, Renewed Motion for Order to Show Cause Why Felicia Trimble Should Not be Held in Contempt for Failing to Appear for Deposition Under Subpoena ("Motion"), should be extended by an additional 41 days to December 19, 2023, and the parties request that the court grant the extension.

Counsel for Wellpath Defendants has now communicated with Ms. Trimble, and she has agreed to appear by deposition on Monday, December 11, 2023 at 9:00 a.m. in accordance with the subpoena served upon her on July 28, 2023. The deposition was scheduled for a Monday because she typically does not work on Mondays, and the time of the day at 9:00 a.m. accommodates Ms. Trimble because her work typically starts at 8 a.m. Counsel for all parties have agreed they are able to attend the deposition on December 11, 2023. Wellpath Defendants has agreed to withdraw this Motion if Ms. Trimble appears at her deposition.

DATED this 9th day of November, 2023

STOVALL & ASSOCIATES

/s/ Ross H. Moynihan

Leslie Mark Stovall  
Nevada Bar No. 2566  
Ross H. Moynihan  
Nevada Bar No. 11848  
2301 Palomino Lane  
Las Vegas, NV 89107  
*Attorneys for Plaintiffs*

### **ORDER**

IT IS SO ORDERED.

Dated: November 9, 2023

LEWIS BRISBOIS BISGAARD & SMITH  
LLP

/s/ Ethan M. Featherstone

S. Brent Vogel  
Nevada Bar No. 6858  
Ethan M. Featherstone  
Nevada Bar No. 11566  
*Attorneys for Defendants*  
*WellPath, LLC; Correct Care Solutions, LLC;*  
*J. Marcos, RN; Earl D. Salviejo, NP; Tanya*  
*Wasielewski, RN; H. Taddeo, RN; Ace T. RN;*  
*Larry Williamson, RN; H. Hannash, RN;*  
*David Oliphant, PA; LPN Alexia; Becky S.*  
*Christensen, RN; Ray Martin Montenegro,*  
*NP; and Kate Purcell, RN*

  
Nancy J. Koppe  
United States Magistrate Judge 2

1 KAEMPFER CROWELL

2 /s/ Ryan W. Daniels

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3 Lyssa S. Anderson

Nevada Bar No. 5781

4 Ryan W. Daniels

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6 Las Vegas, NV 89135

*Attorneys for Defendant*

7 *Las Vegas Metropolitan Police Department*

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